

Ladies and Gentlemen of the Commission:

Broadband over Power Line (BPL) is a bad idea at this point in time, from a technology standpoint, and should not be permitted in the HF spectrum between 2 and 30 MHz. Sending RF signals along lines that were never designed for that purpose represents a poor engineering judgment at best, and dereliction of duty on the part of the Commission at worst.

BPL would fall under the Commission's part 15 rules as an unintentional radiator. Yet studies performed in the UK indicate a 30dB increase in noise floor is observed as an unwanted byproduct of BPL technology. The same study discovered that current technology is incapable of reducing the generated interference to tolerable levels. See the comments from the UK Technical Working Group for full results of the testing performed at :  
<http://www.radio.gov.uk/topics/interference/documents/twg-finalreport.pdf>

The government of Japan has also performed an extensive study of available BPL technology and has determined that it will not permit BPL activity in the HF spectrum. The reason was unacceptable levels of unintentionally radiated signals and the adverse affect upon incumbent users of the HF spectrum. See the following publication for details:  
[http://www.jarl.or.jp/English/4\\_Library/A-4-1\\_News/jn0208.htm](http://www.jarl.or.jp/English/4_Library/A-4-1_News/jn0208.htm)

Other radio services that will be adversely affected by unintentional radiation from BPL services include: radionavigation, aeronautical services (which represent a safety of life situation), military HF operations, amateur radio, broadcasting, and the fixed and mobile service. All of these are licensed users of the HF spectrum, deserving of protection from unlicensed, unintentional radiators in accordance with 47CFR Part 15. If the Commission to permit widespread BPL operation in the 2-30 MHz range, it would represent a gross dereliction of duty on the part of the Commission as it would be failing to honor its legal committment to protect licensed spectrum users from harmful interference caused by unlicensed, unintentional radiators. Hence the Commission should not permit such operations.

If other technologically advanced nations have concluded that BPL in the 2-30 MHz spectrum, what makes us think it will work better in the United States? A wise man once said, "Knowledge is what you gain from your own experience, wisdom is knowledge that you gain from the experiences of others. Wisdom is preferable to knowledge." My fervent hope is that the Commission acquires and employs wisdom in this matter by not permitting widespread BPL operation in the HF spectrum between 2-30MHz.